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April 24, 2014

Via ECF

Hon. Leonard D. Wexler
United States District Court
Eastern District of New York
944 Federal Plaza
Central Islip, New York 11722-9014

Re: Gerardo Orozco, Luis Garcia, and Manual
      Antonio Marquez Cruz

v.   Andel's Delicatessen and Appetizing, Inc.,
      Randy Geschwind and Jonathan Geschwind
      Civil Action No.: 14-CV-00664 (LDW)(WDW)

Dear Honorable Sir:

This office has been retained by each of the defendants in the above captioned matter. We are in receipt of a letter by Austin Graff, counsel for the Plaintiffs, seeking a pre-motion conference to amend for the second time the Plaintiffs' Complaint.
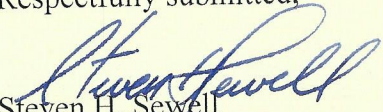
During a recent conversation with Mr. Graff, he advised me that he was aware at the time the original Complaint was prepared, that Debra Alhante might be a shareholder of the corporate defendant, Andel's Delicatessen and Appetizing, Inc., but at that time, elected not to include her as a defendant. During our subsequent conversations and exchange of e-mail, Debra Alhante's status as a shareholder was confirmed.

During my conversation with Mr. Graff, I advised him that since discovery had not yet commenced, while I did not object to a further amendment of the Complaint, since I currently do not represent Debra Alhante, I could not consent to the amendment.

In the event the Court grants the relief requested by Mr. Graff, I respectfully request that Court require the Plaintiffs to proceed as expeditiously as possible to avoid further delay in this case.

STEVEN H. SEWELL, P.C.

Respectfully submitted,

Steven H. Sewell

SHS/st
Cc: Austin Graff, Esq. (ECF)
Cc: Clients
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